

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
NEW ALBANY DIVISION

IN RE:)	Chapter 11
)	
EASTERN LIVESTOCK CO., LLC)	Case No. 10-93904-BHL-11
)	
Debtor.)	Hon. Basil H. Lorch III

**AGREED MOTION TO EXTEND DEADLINES IN SCHEDULING ORDER
REGARDING CONTESTED MATTERS INVOLVING TRUSTEE'S PURCHASE
MONEY CLAIMS REPORT AND OBJECTIONS FILED BY SOLM, CRUMPLER
BROS., KUEHNY AND THE BANK OF KREMLIN**

James A. Knauer ("Trustee"), Stockman Oklahoma Livestock Marketing, Inc. ("SOLM"), Crumpler Bros. ("Crumpler"), Brent Kuehny d/b/a Dollar K Cattle Co. ("Kuehny") and The Bank of Kremlin ("Kremlin" and collectively with the Trustee, SOLM, Crumpler and Kuehny, the "Parties"), respectfully request that the Court extend the deadlines set forth in the *Scheduling Order Regarding Contested Matter Involving Trustee's Purchase Money Claims Report and Objections Filed by SOLM, Crumpler Bros., Kuehny and The Bank of Kremlin* [Dock. No. 622] (the "Scheduling Order") for an additional thirty (30) days in order to allow the Court to rule on the *Motion Requesting Entry of an Order Granting Trustee Authority to Collect Receivable, 2) Hold Receivable Proceeds in Segregated Account Pending Determination of Rights Therein, 3) Transfer Receivable Proceeds to Operating Account After Such Determination and 4) Continuing Briefing Schedule on the Foregoing* [Dock. No. 732] ("Motion") filed by the Trustee contemporaneously herewith.

The Motion seeks to place certain issues between the Parties properly before the Court. Until the Motion is granted, the matters addressed by the Scheduling Order may not properly be before the Court and the Parties desire additional time to make sure that the Court is in a position to make a final determination on the issues when they are heard by the Court. As a

result, the Parties request that the Court enter an order extending all deadlines in the Scheduling Order for an additional thirty (30) days.

WHEREFORE, the Parties respectfully request that the Court enter an order extending the deadlines contained in the Scheduling Order by thirty (30) days and granting the Parties all other just and proper relief.

Respectfully submitted,

BAKER & DANIELS, LLP

By: /s/ Dustin R. DeNeal

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CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2011, a copy of the foregoing pleading was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system.

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